

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

David Goulding, Howard Salamon,)	
Robyn Goulding, and)	
John O'Shea.,)	Case No. 1:22-cv-05224
Plaintiffs,)	
v.)	Honorable Laura K. McNally
)	
Mark Miller,)	
Defendant.)	

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

NOW COMES, attorneys for Plaintiffs, Michael S. Davis and Carla E. Carter of the law firm of Davis & Carter, LLC, and hereby respectfully requests leave of Court to withdraw as counsel.

1. Michael S. Davis filed his appearance for Plaintiffs on 8/07/24 (Dkt 65) and Carla E. Carter filed her appearance on 9/25/24 (Dkt 73).
2. Plaintiffs have failed substantially to fulfill their obligations to attorneys regarding their services, and Plaintiffs have been given reasonable warning that Attorneys will withdraw unless the obligations were fulfilled.
3. Very recently issues have arisen, which prevents attorneys from representing Plaintiffs going forward.
4. Plaintiffs have been advised of Plaintiff's upcoming obligation with respect to the case, specifically that the Court intends to set a trial date as to damages in the near future and that the next status date is November 5, 2025.

5. Attorney Michael S. Davis has advised Plaintiffs to retain counsel to avoid any negative consequence.

6. Defendant has indicated through counsel it is not opposed to this Motion.

WHEREFORE, Attorneys Michael S. Davis and Carla E. Carter respectfully request leave to withdraw as counsel for Plaintiff's.

Respectfully submitted,

/s/ Michael S. Davis

One of the attorneys for Plaintiffs

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